

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11,  
2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-CV-1076 (GBD)

**The O'Neill Plaintiffs' Motion for Entry of Default Judgment Solely as to Liability  
Against the Publication Defendants**

PLEASE TAKE NOTICE that upon the affidavit of Jerry S. Goldman, Esq., and the exhibits attached thereto, the *O'Neill* Plaintiffs, by and through their counsel, Anderson Kill, P.C., will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting the *O'Neill* Plaintiffs' motion for entry of default judgment solely as to liability against the defendants listed in Exhibit 1 to the affidavit of Jerry S. Goldman.

Dated: September 18, 2015  
New York, New York

/s/ Jerry S. Goldman  
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